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Sent: Wednesday, July 05, 2017 3:58 PM

To: Carpet Product Stewardship <CPS@calrecycle.ca.gov>

Subject: California Carpet Stewardship Program Annual Report

I just read the annual report. If you read between the lines, it basically says they are collecting a lot of carpet but doing very little recycling. I believe that this is because their approach is fundamentally flawed. The carpet industry keeps dangling incentives for some unknown third party to step up and recycle their carpet for them. Clearly, this hasn't worked. The fact is that nobody is better placed to recycle carpet than those who manufacture it. AB 2398, which established the program, and the regulations adopted to implement it, all call for a product stewardship approach. The essence of this approach is a circular economy, where products are continuously recycled into new products. Not uncommonly, this requires adjustments to the materials and methods used in manufacturing. The carpet manufacturers seem desperate to avoid fully engaging with this process, but the truth is that there is little likelihood of success until they do.

I encourage CalRecycle to use all the enforcement tools available to encourage the industry to commit to recycling carpet themselves, and to make whatever adjustments are necessary for this process to succeed.